

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

Governor Jesse Ventura, a/k/a James G.  
Janos, an individual,

Civil No. 0:12-cv-00472

Plaintiff,  
vs.

DECLARATION OF  
ANDREW PAUL

Chris Kyle, an individual,

Defendant.

I, Andrew Paul, do state that the following facts are true and correct to the best of my knowledge and belief:

1. I provide this Declaration based on my personal knowledge and information and do so from San Diego, California.
2. I am a reservist Navy SEAL and was a member of SEAL Team 3. Chris Kyle and I were in sister platoons.
3. I first met Chris in April 2005 when we were in a task unit together. Chris and I were also in Iraq together in 2006.
4. I'm aware that Chris has written a book titled *American Sniper*, although I haven't read it yet.
5. Mikey Monsoor was in my platoon. I had returned to the United States from Iraq shortly before Mikey was killed. I was the one who notified Mikey's family of his death and helped take his body off the plane.

6. I also was a pallbearer at Mikey's funeral and went to the gathering of his family and friends at McP's Irish Pub.

7. I don't recall exactly when I arrived at McP's or whether Jesse Ventura was there when I arrived. If he wasn't, then he arrived shortly after I did. I recognized Ventura when I saw him—I grew up watching *Predator* and professional wrestling. I thought it would be cool to meet "The Body."

8. Several other guys had the same idea, and I had to wait my turn to meet Ventura. As I stood there, I heard Ventura running his mouth—crazy talk about the war in Iraq and President Bush and how Bush knew that the September 11 terrorist attack was going to happen and didn't do anything about it. I was surprised. I hadn't known about this side of Ventura. All I really knew was that he was a SEAL who became a governor. But the more I heard, the more turned off I was. I walked away. I never did meet him or shake his hand.

9. Ventura kept on with his obnoxious behavior throughout the evening. He was talking to anyone who would stand there and listen. He was clearly trying to get an audience.

10. It was later in the evening when the scuffle between Chris and Ventura went down—I don't remember exactly what time. I was in a separate corner of the patio at McP's when it happened, so I did not see Chris's fist hit Jesse's face.

11. I did, however, see Ventura pick himself up off the ground, and I saw blood on his lip and noted that his hair was sort of knocked over to one side. It was clear to me that Chris had punched Ventura because the other guys we were with were urging Chris

to leave so he didn't get arrested and because Ventura was screaming at Chris, "Fuck you! I'll fucking kill you!"

12. I recall that the cops were starting to show up, so Chris took off. Someone who was with Ventura sort of dusted him off, patted him on the back, and said something like "move on" or "let it go." Ventura left and I remember seeing him walking down Orange Avenue on the McP's side of the street, headed south.

13. At the time, the fight between Chris and Ventura wasn't that big of a deal. Little scuffles in bars—especially bars where Navy SEALs hang out—are pretty common. I've heard that Ventura claims that he doesn't know who Chris is and that he's never met him. That's also not surprising. When you get beat up in a bar fight, you usually don't know who the other guy is.

14. I'm not a big drinker, and I rarely if ever get drunk. I usually have only one or two beers when I go out and that's probably what I had that day at McP's. I don't know how much Chris had been drinking that day, but I don't remember him being at a point where he wasn't able to take care of himself or wouldn't be able to remember what happened.

15. The morning after the fight, I talked to Chris and asked him what happened. He just said that Ventura was running his mouth and so he punched him.

16. I wasn't close enough to Chris and Ventura in the moments leading up to the punch to have heard Ventura say that the SEALs "deserve to lose a few." But pretty much everything he was saying throughout the evening was incredibly distasteful to the people who were at McP's in remembrance of Mikey. He was saying the wrong things in

the wrong place at the wrong time. In my opinion, he was being as anti-American as you can possibly get. Now, he would probably argue that he was being very American by challenging the government, but for a bunch of guys who had just laid their lives on the line for their country and who were at a wake for their fallen comrade, he's lucky the punch to the face is all he got.

17. A few months ago, Chris's publicist called me. Chris had previously appeared on *The O'Reilly Factor* and had talked about punching Ventura. The publicist told me that because Ventura had denied what Chris said, *The O'Reilly Factor* was doing some additional research for a follow-up story. She asked if a producer from Fox could call me. I agreed, and when I talked to the producer I told him basically what I've said in this declaration.

18. Chris is a great guy and a patriot. He's very tough-minded. He cares about people and he's a guy you want in your platoon. I've never known him to lie to me.

I certify under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge and belief.

Dated at San Diego, California, 16<sup>th</sup> day of April, 2012.

  
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Andrew Paul